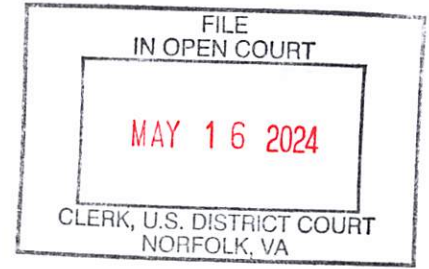


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*



UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 2:23-cr-48
v.	)	
	)	
AMBER DAWN HENDRICKS,	)	
a/k/a AMBER DAWN COSTELLO,	)	
	)	
Defendant.	)	

STATEMENT OF FACTS

The United States and the defendant, AMBER DAWN HENDRICKS, a/k/a AMBER DAWN COSTELLO (hereinafter "HENDRICKS"), stipulate that the allegations contained in the Information and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt with admissible and credible evidence:

1. In January 2022, VBPD and HSI were informed that Colin Costello (separately charged federal defendant) was distributing significant quantities of methamphetamine and was in possession of numerous firearms, despite being a convicted felon. After controlled purchases of methamphetamine were made from Costello, law enforcement obtained a search warrant for the residence he lived in along with HENDRICKS, which was located in Virginia Beach.

2. On April 22, 2022, law enforcement executed the search warrant and recovered over 400 grams of methamphetamine and fourteen firearms.

3. HENDRICKS was present when the search warrant was executed. She told law enforcement that some of the firearms recovered belonged to her.

KGB  
AC  
WBS

4. HENDRICKS further admitted she was a methamphetamine user and that she last used methamphetamine the day before the search warrant.

5. According to records obtained by law enforcement, HENDRICKS purchased a Tisas Pistol, Model: ZIG M1911, Caliber: .45ACP on March 3, 2022 in Virginia Beach. At the time of the purchase, and while she was in possession of this firearm, HENDRICKS was an unlawful user of and addicted to a controlled substance, namely methamphetamine.

6. HENDRICKS also purchased a Merak Savunma Sanayi, Model: Charles Daly Shotgun Model 301,12 Gauge, and an Arex Pistol, Model: Rex Zero IS, Caliber: 9x19mm on April 20, 2022 in Virginia Beach. At the time of the purchase, and while she was in possession of these firearms, HENDRICKS was an unlawful user of and addicted to a controlled substance, namely methamphetamine.

7. The Tisas Pistol, Model: ZIG M1911, Caliber: .45ACP; Merak Savunma Sanayi, Model: Charles Daly Shotgun Model 301,12 Gauge; and (3) Arex Pistol, Model: Rex Zero IS, Caliber: 9x19mm, were each manufactured outside the Commonwealth of Virginia and were each previously shipped and transported in interstate and/or foreign commerce.

8. Virginia Beach is within the Eastern District of Virginia.

9. HENDRICKS' participation in the events described was undertaken knowingly, intentionally, and unlawfully, and not as a result of an accident, mistake, or other innocent reason.

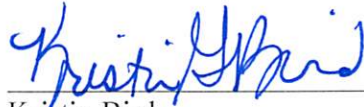
10. HENDRICKS acknowledges that the foregoing statement of facts does not describe all of her conduct relating to the offense charged in this case nor does it identify all of the persons with whom she may have engaged in illegal activities.

KGB  
JC mps

Respectfully submitted,

Jessica D. Aber  
United States Attorney

By:



Kristin Bird  
Assistant United States Attorney

KGB  
AC nps

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



AMBER DAWN HENDRICKS  
a/k/a/ AMBER DAWN COSTELO  
Defendant

I am counsel for AMBER DAWN HENDRICKS. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



Mark Stokes, Esq.  
Attorney for Amber Dawn Hendricks

